


June 22, 2021

Via ECF

Honorable Debra Freeman
United States District Court
500 Pearl Street
New York, NY 10007

The parties' joint proposal is adopted. Defendant's time to respond to the Amended Complaint is extended to 8/9/2021. Discovery shall be stayed pending further Order of the Court. Joint status report by 7/22/2021.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge
Dated: 6/25/2021

RE: *The Keith Haring Foundation Inc. & Keith Haring Studio, LLC v. Gin&Tonic LLC & Ezrasons Inc.*, Case No: 1:20-cv-01961-LAK-DCF

Dear Judge Freeman:

We represent Gin&Tonic LLC and Ezrasons Inc. ("Defendants") in the above-referenced action initiated by the Keith Haring Foundation Inc. and Keith Haring Studio, LLC ("Plaintiffs"). We write jointly together with Plaintiffs to provide a further update to the letter jointly submitted by the parties on May 12, 2021 (Doc. 49).

As noted in the May 12 letter, the parties have engaged in numerous discussions regarding mediating or otherwise resolving their dispute. After additional meet-and-confers following the May 12 letter, the parties have now agreed to engage in a global mediation of the claims brought in both this action and the related state court action (NY Supreme Court Index No. 650985/2020).

To that end, and to allow the parties to focus their energies and resources on mediation, the parties propose to: (a) extend the time for Defendants to respond to the amended complaint roughly 60 days, from June 10, 2021, to August 9, 2021; and (b) to stay the discovery deadlines proposed in their April 2, 2021 letter to the Court (Doc. 47), which were so-ordered on April 3, 2021 (Doc. 48). The parties propose to provide periodic status updates to the Court on the status of their mediation efforts, with the first status update being due July 22, 2021. If mediation does not dispose of all the claims asserted in this action, the parties propose to set forth a revised discovery schedule, taking into account the newly added party Ezrasons Inc., upon its final report regarding mediation to the Court.

We appreciate Your Honor's time and assistance with these matters.

Respectfully submitted,

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